

## **EXHIBIT D**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NO. C 07-02757

DONNA MATHEWS

VERSUS

PAN AMERICAN LIFE INSURANCE COMPANY;  
And Doe 1 through Doe 20, Inclusive

Videotape deposition of ELAINE M.  
BOURG, 14 Ormond Place, Destrehan,  
Louisiana 70047, taken in the offices of  
Affiliated Reporting, 650 Poydras Street,  
Suite 2610, New Orleans, Louisiana 70130 on  
Friday, March 14, 2008.

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VIDEOGRAPHER: KARL STEGEMAN

REPORTED BY:

LINDY ROOT  
Certified Court Reporter  
Registered Professional Reporter

1 A. No. It was spiral -- Not a spiral. A  
2 regular file folder. A paper folder.

3 Q. Oh, okay.

4 Do you know what was inside it?

5 A. No.

6 Q. Okay. All right.

7 Let's go to another document, a  
8 document that was previously marked as  
9 Exhibit #12.

10 I will pass that over to you.

11 I would like you to start with the  
12 second page of that document, a page that  
13 appears to be entitled Accident and Health  
14 Claim Check Request/worksheet.

15 Do you see that?

16 A. Yes.

17 Q. Okay. Have you seen forms of this sort  
18 before?

19 A. Yes.

20 Q. Okay. First, I want to direct your  
21 attention down to the bottom right corner.

22 A. Yes.

23 Q. Which your name appears to be typed there.

24 Do you see that?

25 A. Yes.

1 Q. Okay. Do you know whether you caused your  
2 name to be typed there?

3 A. Yes.

4 Q. Yes, you know?

5 A. Yes. Yes.

6 Q. Yes, and yes you did it?

7 A. I did it.

8 Q. Okay. All right.

9 Let's go -- I want to go through some  
10 of these numbers that are a little  
11 confusing for me.

12 A. Okay.

13 Q. Okay. First off, in the upper left-hand  
14 corner, there's a number for policy number?

15 A. Yes.

16 Q. Okay. That would be the policy number for  
17 the policy you were working on?

18 A. Yes. Uh-huh (affirmative response).

19 Q. Okay. Then beneath that is a category  
20 called form number.

21 A. Uh-huh (affirmative response).

22 Q. What is that for?

23 A. That was the form number on the insurance  
24 policy or of the insurance policy.

25 Q. I see.

1           So there are both policies and forms  
2           then. Is that right?

3           A. That was the number of the policy.

4           Q. Okay. Where did you get that form number?

5           A. Computer.

6           Q. Okay. Beneath that is a category called  
7           CDS code.

8           Do you see that?

9           A. Uh-huh (affirmative response).

10          Q. What is a CDS code?

11          A. I have no idea.

12          Q. Okay. Do you know why in the box  
13           immediately before that it says A-1?

14          A. No.

15          Q. Okay. Was that something that appeared  
16           automatically on the form?

17          A. Yes.

18          Q. Okay. So was it always A-1 in that box?

19          A. Yes.

20          Q. Okay. And then to the right of that is a  
21           category called cash account.

22          Do you see that?

23          A. Uh-huh (affirmative response).

24          Q. And what does that refer to?

25          A. I think that was one of the accounts that

REPORTER'S CERTIFICATE

I, LINDY ROOT, Certified Court Reporter,  
do hereby certify that the above-mentioned  
witness, after having been first duly sworn by  
me to testify to the truth, did testify as  
hereinabove set forth;

That the testimony was reported by me in  
shorthand and transcribed under my personal  
direction and supervision, and is a true and  
correct transcript, to the best of my ability  
and understanding;

That I am not of counsel, not related to  
counsel or the parties hereto, and not in any  
way interested in the outcome of this matter.



LINDY ROOT

CERTIFIED COURT REPORTER

REGISTERED PROFESSIONAL REPORTER

